



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

MURIEL GOODE-TRUFANT  
Corporation Counsel

KELLYANNE HOLOHAN  
Assistant Corporation Counsel  
E-mail: kholohan@law.nyc.gov  
Phone: (212) 356-2249  
Fax: (212) 788-9776

December 30, 2024

**VIA ECF**

Honorable Cheryl L. Pollak  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Armond McCloud, Jr., v. City of New York, et. al.*, 23 CV 8341 (NRM)(CLP)

Your Honor:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, assigned to the defense in the above referenced matter. Defendant City respectfully submits this letter in accordance with the Court's December 9, 2024 order. *See* Civil Docket Entry dated December 9, 2024.

By way of brief background, Plaintiff commenced this action on or about November 9, 2023 alleging that on August 8, 1994 he was detained and questioned at the 110<sup>th</sup> Precinct as a suspect in the death of Mr. Kei Sunada, who was killed during a robbery in Lefrak City four days earlier. *See* Civil Docket Entry No. 1. Plaintiff further claims that, although he was innocent, he made a confession which was coerced and made under duress. *Id.* Plaintiff was subsequently indicted, tried, convicted, and served more than twenty years of incarceration, during which time he was subjected to physical and sexual assault. *Id.*

By way of brief procedural background, the parties attended a conference in front of Your Honor on December 9, 2024. Counsel for Plaintiff discussed that some discovery was still outstanding, though defendant City was making efforts to obtain documents and had turned over additional documents and information since the requests were initially made. On December 19, 2024, the parties engaged in a brief meet and confer confirming the scope of the outstanding discovery. The undersigned has receive voluminous employment records of the individual defendants but will need some additional time to appropriately redact them before they can be

produced. Further, the undersigned is awaiting additional responsive documents but is hopeful that within thirty days those documents will be received and produced to Plaintiff.

At the meet and confer, the parties conferred on substance and schedule and agreed that, if the Court would allow, a settlement conference scheduled for early March would be helpful to the parties as they explore resolution of the matter. The parties are happy to submit a joint request to this effect.

Thank you for your consideration.

Respectfully submitted,

/s/KellyAnne Holohan

KellyAnne Holohan

Assistant Corporation Counsel

cc: All Counsel (via ECF)